

**UNITED STATES DISTRICT COURT
FOR THE**

SOUTHERN DISTRICT OF IOWA

**Request for Modifying the Conditions of Supervision
without Consent of the Offender**

Name of Offender:	Agron M. Simpson	Case Number:	3:00-cr-00246-001
Name of Sentencing Judicial Officer:	Charles W. Wolle, Senior U.S. District Judge		
Date of Original Sentence:	May 17, 2001		
Original Offense:	21 U.S.C. § 846 - Conspiracy to Distribute and Possession with Intent to Distribute Cocaine and Cocaine Base		
Original Sentence:	235 months imprisonment; 60 months supervised release; 188 months imprisonment; 60 months supervised release (Amended May 23, 2008); 151 months imprisonment; 60 months supervised release (Amended February 9, 2012).		
Special Conditions:	1) Substance abuse testing/treatment; no alcohol; 2) Sex offender treatment; 3) Refrain from associating with gang members.		
Date Supervision Commenced:	October 1, 2013		
Assistant U.S. Attorney:	Clifford R. Cronk, III	Defense Attorney:	Federal Public Defender

PETITIONING THE COURT

To modify the conditions of supervision as follows:

The defendant shall participate in a program of curfew for a period of 120 days. During this time, the defendant shall remain at his place of residence except for employment and other activities approved in advance, and provide the U.S. Probation Officer with requested documentation. If required, the defendant shall maintain a telephone at his place of residence without "call forwarding," "call waiting," a modem, "caller ID," or "call back/call block" services for the above period. The defendant shall wear a monitoring device which may include an electronic monitoring device, a global positioning system (GPS) device, random calls, and/or voice verification, and he shall follow the monitoring procedures as instructed by the U.S. Probation Officer. The defendant shall pay for the location monitoring equipment at the prevailing rate or in accordance with ability to pay.

CASE SUMMARY

On October 1, 2013, the offender's term of supervised release commenced. On October 4, 2013, the offender began employment at Premier Maps in Davenport, Iowa. On January 14, 2014, the offender completed his Psychosexual Evaluation with Steven Draminski at the Robert Young Center in Moline, Illinois. The offender has been recommended to attend individual sessions with Mr. Draminski to prepare him for his polygraph on March 18, 2014.

On January 21, 2014, a Report on Offender was submitted to the Court as the offender failed to notify the probation office of his change in residence or his change in employment. At that time, the offender was admonished for his behavior and his conditions of supervised release were reviewed with him.

Violation**Nature of Non-Compliance**

1) Failure to follow the directives of the probation officer.

a) On January 28, 2014, this officer directed the offender to stay at his registered address and not stay at any other residence's.

b) On February 23, 2014, SUSPO Song and this officer attempted an unannounced home contact at the offender's residence. Antwain Stewart stated the offender did not stay there the previous evening.

c) On February 24, 2014, the offender admitted to this officer that he fell asleep at a hotel.

2) Refrain from associating with convicted felons.

a) On February 27, 2014, this officer conducted a criminal background check on Mr. Antwain Stewart. The results indicate that Mr. Stewart is a convicted felon.

The modification request has been presented to the offender and the offender has declined to sign a Waiver of Hearing to Modify the Conditions Without a Hearing. Therefore, the Probation Office is petitioning the Court to schedule a hearing to address this modification request.

Respectfully submitted,

By



Eric R. Hermes
U.S. Probation Officer
March 3, 2014